

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE,

Plaintiff,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA; and  
individuals TAMIKO STRICKMAN and  
JOHN ROE, individually and in their  
official capacities; and OTHER  
UNIDENTIFIED DEFENDANTS;

Defendants.

**CASE NO. 4:21-CV-3049**

**MOTION TO DISMISS AND STRIKE**

COME NOW Defendants—the Board of Regents of the University of Nebraska (“BRUN”) and Tamiko Stickman (“Strickman”), individually and in her official capacity (collectively referred to as “Defendants”)—by and through their attorneys of record, and hereby move the Court pursuant to FED. R. CIV. P. 12(b)(6) and 12(b)(1) to dismiss all claims asserted against them in Plaintiff’s Second Amended Complaint. In the alternative, Defendants move the Court pursuant to FED. R. CIV. P. 12(f) to strike all claims that are based upon actions or inactions that accrued prior to February 28, 2017.

In support of their Motion, Defendants rely upon their Brief submitted contemporaneously herewith.

WHEREFORE, Defendants respectfully request the Court grant their Motion to Dismiss Plaintiff’s Second Amended Complaint in its entirety and with prejudice. To the extent the Court does not dismiss any or all of the claims in the Second Amended Complaint, Defendants respectfully request that they strike all claims based upon actions or inactions that accrued prior to February 28, 2017.

Dated this 4<sup>th</sup> day of October, 2021.

Board of Regents of the University of  
Nebraska and Tami Strickman,  
individually and in her official capacity,  
Defendants

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties who have entered an appearance in this case as well as electronically transmitted.

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/s/ Lily Amare  
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